

1 DAVID G. WILLE (*Pro Hac Vice*) (TX Bar No. 08945388)
JEFFERY D. BAXTER (*Pro Hac Vice*) (TX Bar No. 24006816)
2 AARON DAVIDSON (*Pro Hac Vice*) (TX Bar No. 24007080)
3 SAMIR A. BHAVSAR (*Pro Hac Vice*) (TX Bar No. 00798065)
BAKER BOTTS L.L.P.

4 2001 Ross Avenue
Dallas, TX 75201
5 Telephone: (214) 953-6500
Facsimile: (214) 953-6503
6 E-mail: david.wille@bakerbotts.com
E-mail: jeff.baxter@bakerbotts.com
7 E-mail: aaron.davidson@bakerbotts.com
8 E-mail: samir.bhavsar@bakerbotts.com

9 STEPHEN E. TAYLOR (SBN 058452)
JONATHAN A. PATCHEN (SBN 237346)
10 CHRISTOPHER A. WIMMER (SBN 263275)
TAYLOR & COMPANY LAW OFFICES, LLP
11 One Ferry Building, Suite 355
12 San Francisco, California 94111
Telephone: (415) 788-8200
13 Facsimile: (415) 788-8208
E-mail: staylor@tcolaw.com
14 E-mail: jpatchen@tcolaw.com
15 E-mail: cwimmer@tcolaw.com

16 Attorneys for Plaintiff
INFINEON TECHNOLOGIES AG

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 INFINEON TECHNOLOGIES AG, a
21 German corporation,

22 Plaintiff and
23 Counterdefendant,

24 vs.

25 VOLTERRA SEMICONDUCTOR
CORPORATION, a Delaware corporation,

26 Defendant and
27 Counterclaimant.

Case No. CV-11-6239 (MMC) (DMR)

STIPULATED REQUEST AND
~~PROPOSED~~ ORDER CHANGING TIME
PURSUANT TO CIVIL LOCAL RULE
6-2(a)

Judge: Hon. Maxine M. Chesney
Complaint Filed: January 21, 2010

1 Plaintiff and Counterdefendant INFINEON TECHNOLOGIES AG (“Infineon”) and
2 Defendant and Counterclaimant VOLTERRA SEMICONDUCTOR CORPORATION
3 (“Volterra”) (collectively “the Parties”) have conferred by and through their counsel and pursuant
4 to Civil Local Rules 6-2 and 7-12, and subject to the Court’s approval, HEREBY STIPULATE AS
5 FOLLOWS:

6 WHEREAS, on July 17, 2012, the Court entered the Parties’ Stipulated Protective Order
7 (ECF 104);

8 WHEREAS, the Protective Order requires each party to notify the other in advance of
9 disclosing documents designated “Highly Confidential - Outside Counsels’ Eyes Only” to an
10 expert witness and provide the party who designated the material confidential opportunity to
11 object;

12 WHEREAS, on August 22, 2014, Infineon disclosed to Volterra its intent to disclose
13 confidential information to Mr. Peter Elenius;

14 WHEREAS, on August 29, 2014, Volterra objected to the disclosure;

15 WHEREAS, the Protective Order requires, upon unresolved objections, the party seeking
16 to disclose confidential information to file a Motion with the Court within 5 days of the objection,
17 seeking permission to disclose the confidential information;

18 WHEREAS, absent extension, Infineon’s Motion, pursuant to Section 7.4(c) of the
19 Protective Order, would be due September 3, 2014;

20 WHEREAS, the Parties have been negotiating additional protections that may resolve
21 Volterra’s objections to Infineon’s disclosure of confidential information to Mr. Elenius;

22 WHEREAS, the Parties mutually agree that those discussions may be useful in an effort to
23 prevent motion practice before the Court and mutually agree to extend Infineon’s time period to
24 move for permission to disclose pursuant to the Protective Order; and

25 WHEREAS, set forth below are the previous time modifications in this case:

26 (a) Stipulation and Order regarding date by which Volterra may answer, move
27 or otherwise plead in response to complaint extended to March 16, 2010 (ECF No. 8);

28 (b) Stipulation and Order Extending Response and Hearing Dates re Plaintiff’s

1 Motion for Leave to Amend Its Infringement Contentions to Add Additional Model Numbers
2 (ECF No. 202).

3 (c) Stipulation Request and Order Changing Time Pursuant to Civil Local Rule
4 6-2(A) (ECF No. 211).

5 (d) Stipulation and Order Extending Response and Hearing Dates re Plaintiff's
6 Motion for Leave to Amend Its Infringement Contentions to Add Additional Model Numbers
7 (ECF No. 218).

8 (e) Clerk's Notice Continuing Case Management Conference (ECF No. 221)

9 (f) Stipulation and Order Continuing Case Management Conference (ECF No.
10 238).

11 (g) Stipulation and Order Continuing Case Management Conference (ECF No.
12 283).

13 (h) Stipulation and Order Continuing Case Management Conference (ECF No.
14 288).

15
16 NOW, THEREFORE, the Parties hereby propose, stipulate and agree as follows, by and through
17 their respective counsel of record, and subject to the Court's approval, that:

- 18 1. Infineon shall have until Friday, September 5, 2014 to file an opening brief for
19 permission to disclose Protected Material to its Expert with the Court and Volterra shall
20 file an opposition brief three (3) days later pursuant to Section 7.4(c) of the Protective
21 Order.

22 IT IS SO STIPULATED.

23 //

24 //

25 //

26 //

27 //

Respectfully submitted,

Dated: September 3, 2014

BAKER BOTTS, L.L.P.

By: /s/ Aaron D. Davidson
Aaron D. Davidson

Attorneys for Plaintiff and Counterdefendant
INFINEON TECHNOLOGIES AG

Dated: September 3, 2014

WEIL, GOTSHAL & MANGES

By: /s/
Anne M. Cappella

Attorneys for Defendant VOLTERRA
SEMICONDUCTOR CORPORATION

~~PROPOSED~~ ORDER

Pursuant to the above Stipulation, and good cause appearing therefore,

IT IS SO ORDERED.

DATED: September 4, 2014



HONORABLE MAXINE M. CHESNEY

SENIOR DISTRICT COURT JUDGE

GENERAL ORDER ATTESTATION

I, Aaron D. Davidson, am the ECF user whose ID and password are being used to file the Stipulation And [Proposed] Order Changing Time Pursuant to Civil Local Rule 6-2(a). In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each listed counsel above has concurred in this filing.

Dated: September 3, 2014

/s/ Aaron D. Davidson

Aaron D. Davidson